JEFFREY P. CHARTIER, ESQ.

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APPLICATION GRANTED SO ORDERED Alexander VERNON S. BRODERICK

March 4, 2020

U.S.D.J. 3/5/2020

VIA ECF

Honorable Vernon S. Broderick United States District Court Judge Southern District of New York Thurgood Marshall United States Courthouse 40 Foley Square New York, NY 10007 The status conference scheduled for March 6, 2020 is hereby adjourned to April 3, 2020 at 12:30 p.m. The adjournment is necessary to permit counsel sufficient time to review discovery and discuss a pretrial disposition of this matter. The Court finds that the ends of justice served by granting a continuance outweigh the best interests of the public and the defendant in a speedy trial. Accordingly, it is further ordered that the time between March 6, 2020 and April 3, 2020 is hereby excluded under the Speedy Trial Act, 18 U.S.C. 3161(h)(7)(A), in the interest of justice.

RE: <u>United States v. Rafael Valdovinos</u> 1:19-CS-00671-VSB

Dear Judge Broderick:

Please be advised that I represent Rafael Valdovinos in the aforementioned matter. Mr. Valdovinos is presently scheduled for a status conference Friday, March 6, 2020.

I am respectfully requesting an adjournment of Mr. Valdovinos' status conference. I have communicated with AUSA Nicholas Chiuchiolo and we have jointly agreed to adjourn this matter for at least one month, to a date that is most convenient to the Court. We are still working on resolving this matter without a trial and we are working on a disposition.

On behalf of my client, Rafael Valdovinos, we consent to the exclusion of time under the Speedy Trial Act, 18 U.S.C. § 3161. Thank you for your time and consideration.

Respectfully submitted,

JEFFREY P. CHARTIER

JPC/cs

cc: AUSA Nicholas Chiuchiolo (Via ECF)